

IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF LOUISIANA

STATE OF MISSOURI, *et al.*,

Plaintiffs,

v.

DONALD J. TRUMP., in his official capacity as
President of the United States of America, *et al.*,

Defendants.

No. 22-cv-1213

Consolidated with No. 23-cv-381

Chief Judge Terry A. Doughty
Mag. Judge Kayla D. McClusky

**CONSENT MOTION FOR A STAY OF DEFENDANTS' DEADLINES
IN LIGHT OF LAPSE OF APPROPRIATIONS**

Defendants respectfully move for a stay of their October 7, 2025 deadline for their submission describing their position regarding the effect of Executive Order 14149 on this action and all subsequent deadlines.

1. At the end of the day on September 30, 2025, the appropriations act that had been funding the Department of Justice expired and those appropriations to the Department lapsed. The same is true for the majority of other Executive agencies, including many of the Federal Defendants in this action. The Department does not know when such funding will be restored by Congress.

2. Absent an appropriation, Department of Justice attorneys and employees of many of the Federal Defendants are prohibited from working, even on a voluntary basis, except in very limited circumstances, including “emergencies involving the safety of human life or the protection of property.” 31 U.S.C. § 1342.

3. Undersigned counsel for the Department of Justice therefore requests a stay of the October 7, 2025 deadline and all subsequent deadlines until Congress has restored appropriations to the Department.

4. If this motion for a stay is granted, undersigned counsel will notify the Court as soon as Congress has appropriated funds for the Department. Defendants request that, at that point, all current deadlines for the parties be extended commensurate with the duration of the lapse in appropriations—*i.e.*, each deadline would be extended by the total number of days of the lapse in appropriations.

5. Undersigned counsel contacted counsel for Plaintiffs regarding the relief sought in this motion. Counsel for Plaintiffs consent to the requested relief.

6. Accordingly, although we greatly regret any disruption caused to the Court and the other litigants, Defendants hereby move for a stay of the October 7, 2025 deadline and all subsequent deadlines in this action until Department of Justice attorneys are permitted to resume their usual civil litigation functions. A proposed order is attached.

Dated: October 1, 2025

Respectfully submitted,

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/s/ Indraneel Sur

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